

AR201-14103

Richard Hefter

12/04/2002 03:52 PM

To: NCIC HPV@EPA

cc:

Subject: RE: EPA comments on Chloroacetyl Chloride HPV Challenge
submission n

Response to EPA comments--These came directly to me. Three more will follow.

----- Forwarded by Richard Hefter/DC/USEPA/US on 12/04/02 03:49 PM -----



"Deford, Connie (CL)"

<CLDeford@dow.com

>

11/15/02 04:54 PM

To: Richard Hefter/DC/USEPA/US@EPA

cc: Ralph Northrop/DC/USEPA/US@EPA

Subject: RE: EPA comments on Chloroacetyl Chloride HPV Challenge
submission n

Please find attached The Dow Chemical Company's response to EPA comments on our Chloroacetyl Chloride HPV Challenge submission. Please let me know if you need to receive our letter in a pdf file or if the letter needs to be sent to a different site.

Thank you.

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Global EH&S Product Leader
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EPA HPV CAC Response.doc

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OPT NCIC
2002 DEC -6 AM 9:15



The Dow Chemical Company
Midland, Michigan 48674

2020 Dow Center
November 15, 2002

Richard Hefter
U.S. Environmental Protection Agency

Dear Mr. Hefter:

Thank you for your review of our Chemical RTK HPV Challenge Submission on Chloroacetyl Chloride (CAC). This letter is the initial response of The Dow Chemical Company (Dow) to the conclusions that EPA reached on the CAC Submission. As noted below, we will be providing additional information to respond further to the conclusions noted by the EPA.

1. Physicochemical and Environmental Fate Data:

- (a) The submission will be updated to identify whether each of the physicochemical data points are measured or calculated.
- (b) Dow will be providing an enhanced IUCLID Chloroacetic Acid (CAA) document, which should fulfill the Agency's request to have access to this biodegradation, transport and distribution data.

2. Health Endpoints:

- (a) Dow appreciates the Agency's interest in seeking adequate information to confirm that CAC is used as a closed-system intermediate. However, Dow is unsure that it can provide further detail without claiming it as *Confidential Business Information (CBI)*. Dow would like to schedule a teleconference with the Agency to discuss this issue further.
- (b) Dow will review the existing published mutagenicity data that the EPA has referenced to determine whether it will fulfill the HPV genetic toxicity endpoints.
- (c) As noted above, Dow will be providing the IUCLID document on CAA, which the Agency can use to supplement a number of health endpoints on Chloroacetyl Chloride.

3. Ecological Endpoints:

Dow will be providing the IUCLID document on CAA, which the Agency can use to determine the adequacy of such studies to meet the ecological endpoints where Chloroacetyl Chloride data is not available.

The updated CAC IUCLID document, an enhanced CAA IUCLID document, and other relevant information will be provided to the EPA by January 15, 2003.

Please let us know whom we should contact to arrange a teleconference to discuss further the data that EPA would like to receive to satisfy the requirements of a closed looped intermediate.

Regards,

Connie L. Deford
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Industrial Chemicals
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email: cldeford@dow.com